

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING COUNTY, WASHINGTON, et al.,

Defendants.

No. 2:20-cv-203-RJB

**JOINT STIPULATION FOR RELIEF
FROM THE COURT'S CURRENT
DEADLINE FOR DISCLOSURE OF
EXPERT DISCOVERY PURSUANT
TO FRCP 26(a)(2)**

1 Plaintiff United States of America and Defendants King County and Dow Constantine
2 hereby stipulate, pursuant to Local Civil Rule 7(j), as follows:

3 WHEREAS, the Court's Minute Order Setting Trial and Pretrial Dates (Dkt. No. 18)
4 directs the parties to make any Rule 26(a)(2) disclosures no later than August 19, 2020.

5 WHEREAS, the parties are still in the process of reviewing and producing documents
6 and other electronically stored information that are potentially relevant to expert opinions one
7 or both parties may disclose, and are negotiating the terms of a protective order;

8 WHEREAS, the discovery deadline in the case currently is October 19, 2020; and

9 WHEREAS, the parties agree that there is good cause to extend of the deadline for
10 making expert disclosures by approximately two weeks;

11 NOW THEREFORE, the Parties, through their respective counsel of record, do hereby
12 stipulate and agree as follows:

13 The parties shall make any Rule 26(a)(2) disclosures no later than September 4, 2020.
14 SO STIPULATED.

15
16 Respectfully submitted, August 13, 2020.
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Michael J. Gerardi

BRIAN T. MORAN
United States Attorney

ALEXANDER K. HAAS
Director

JACQUELINE COLEMAN SNEAD
Assistant Branch Director

Michael J. Gerardi (D.C. Bar No. 1017949)
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW, Room 12212
Washington, D.C. 20005
Tel: (202) 616-0680
Fax: (202) 616-8460
E-mail: michael.j.gerardi@usdoj.gov

Attorneys for Plaintiff

/s/ Timothy G. Leyh
/s/ Kristin E. Ballinger
/s/ Shane P. Cramer
/s/ Timothy P. Barnes
/s/ H. Kevin Wright

HARRIGAN LEYH FARMER &
THOMSEN LLP
Timothy G. Leyh, WSBA #14853
Kristin E. Ballinger, WSBA #28253
Shane P. Cramer, WSBA #35099
999 Third Avenue, Suite 4400
Seattle, WA 98104
Tel: (206) 623-1700
Email: timl@harriganleyh.com
Email: kristinb@harriganleyh.com
Email: shanec@harriganleyh.com

DANIEL T. SATTERBERG
King County Prosecuting Attorney

Timothy P. Barnes, WSBA #29929
H. Kevin Wright, WSBA #19121
Senior Deputy Prosecuting Attorneys
516 Third Avenue, Suite W400
Seattle, WA 98104
Tel: (206) 477-1120
Fax: (206) 296-0191
Email: timothy.barnes@kingcounty.gov
Email: kevin.wright@kingcounty.gov

*Attorneys for King County and Dow
Constantine*

[PROPOSED] ORDER

This matter comes before the Court on the Parties' Joint Stipulation for Relief from the Court's Current Deadline for Disclosure of Expert Discovery Pursuant to FRCP 26(a)(2). After considering the Parties' Joint Stipulation, the Court hereby ORDERS as follows:

- The parties shall make any Rule 26(a)(2) disclosures no later than September 4, 2020.

IT IS SO ORDERED.

DATED this _____ day of _____, 2020.

Robert J. Bryan
United States District Judge

Presented By:

**UNITED STATES
DEPARTMENT OF JUSTICE**

/s/ Michael J. Gerardi

/s/ Timothy G. Leyh
/s/ Kristin E. Ballinger
/s/ Shane P. Cramer
/s/ Timothy P. Barnes
/s/ H. Kevin Wright

BRIAN T. MORAN
United States Attorney

ALEXANDER K. HAAS
Director

JACQUELINE COLEMAN SNEAD
Assistant Branch Director

Michael J. Gerardi (D.C. Bar No. 1017949)
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW, Room 12212
Washington, D.C. 20005
Tel: (202) 616-0680
Fax: (202) 616-8460
E-mail: michael.j.gerardi@usdoj.gov

Attorneys for Plaintiff

HARRIGAN LEYH FARMER &
THOMSEN LLP
Timothy G. Leyh, WSBA #14853
Kristin E. Ballinger, WSBA #28253
Shane P. Cramer, WSBA #35099
999 Third Avenue, Suite 4400
Seattle, WA 98104
Tel: (206) 623-1700
Email: timl@harriganleyh.com
Email: kristinb@harriganleyh.com
Email: shanec@harriganleyh.com

DANIEL T. SATTERBERG
King County Prosecuting Attorney

Timothy P. Barnes, WSBA #29929
H. Kevin Wright, WSBA #19121
Senior Deputy Prosecuting Attorneys
516 Third Avenue, Suite W400
Seattle, WA 98104
Tel: (206) 477-1120
Fax: (206) 296-0191
Email: timothy.barnes@kingcounty.gov
Email: kevin.wright@kingcounty.gov

*Attorneys for King County and Dow
Constantine*

CERTIFICATE OF SERVICE

The undersigned certifies that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system on August 13, 2020.

/s/ Michael J. Gerardi

Trial Attorney

United States Department of Justice

Civil Division, Federal Programs Branch

Telephone: (202) 616-0680

Email: Michael.j.gerardi@usdoj.gov